

Filed 06/03/2008

THE CITY OF NEW YORK

MICHAEL A. CARDOZO Corporation Counsel

LAW DEPARTMENT

JEFFREY C. BROOKS

Assistant Corporation Counsel Tel.: (212) 788-9736 Fax: (212) 788-9776

Email. jbrooks@law.nyc.gov

EAD CASE OY CIV 79ZZ FILE ALSO IN 04 CIV 7921 (PJE)

Honorable James C. Francis IV United States Magistrate Judge Southern District of New York 500 Pearl Street, Room 1960 New York, New York 10007-1312

USDS SDNY DOCUMENT

ELECTRONICALLY FILED

Re: RNC Consolidated Cases

Dear Judge Francis:

I write in reference to motions filed by defendants on January 22, 2008 in thirtyeight of the RNC-related actions consolidated before Your Honor for discovery. applications were omnibus motions to compel certain discovery from the plaintiffs in these actions. A list of the cases in which these motions were filed is annexed hereto as Appendix A.

At the last status conference, Your Honor stated that the parties could choose whether they wanted to file these motions with the Clerk of the Court. Defendants seek to file these motions with the Clerk, and therefore respectfully request that Your Honor enter an order permitting defendants to file their January 22, 2008 case-specific motions and any replies thereto under seal. As the Court is aware, sealing is required because in these case-specific applications defendants moved for, inter alia, orders compelling certain plaintiffs to produce releases for access to their mental health and medical treatment records and, in so moving, discussed various plaintiffs' histories.

Respectfully submitted,

Jeffrey C. Brooks

RNC Distribution List (via email) cc:

Abdell, Tarasik, et al. v. City of New York, et al., 05 CV 8453 (RJS) (JCF)

Adams, Courtney Lee, et al. v. City of New York, et al., 05 CV 9484 (RJS) (JCF)

Araneda, Barbara, et al. v. City of New York, et al., 05 CV 9738 (RJS) (JCF)

Banno, Yusuke v. City of New York, et al., 06 CV 2270 (RJS) (JCF)

Bastidas, Betty, et al. v. City of New York, et al., 05 CV 7670 (RJS) (JCF)

Biddle, Jeremy, et al. v. City of New York, et al., 05 CV 1570 (RJS) (JCF)

Botbol, Sacha, et al. v. City of New York, et al., 05 CV 1572 (RJS) (JCF)

Bunim, Sharone, et al. v. City of New York, et al., 05 CV 1562 (RJS) (JCF)

Coburn, Sarah, et al., v. City of New York, et al., 05 CV 7623 (RJS) (JCF)

Conley, Brian v. City of New York, et al., 05 CV 10024 (RJS) (JCF)

Crotty, Emilia, et al. v. City of New York, et al., 05 CV 7577 (RJS) (JCF)

Drescher, Udo v. City of New York, et al., 05 CV 7541 (RJS) (JCF)

Dudek, Carol v. City of New York, et al., 04 CV 10178 (RJS) (JCF)

Eastwood, Corey, et al. v. City of New York, et al., 05 CV 9483 (RJS) (JCF)

Galitzer, Gwynn v. City of New York, et al., 05 CV 7669 (RJS) (JCF)

Garbini, Adrienne, et al. v. City of New York, et al., 05 CV 1565 (RJS) (JCF)

Greenwald, Adam, et al. v. City of New York, et al., 05 CV 1566 (RJS) (JCF)

Kalra, Ritu, et al. v. City of New York, et al., 05 CV 1563 (RJS) (JCF)

Karlin, Annette v. City of New York, et al., 05 CV 7789 (RJS) (JCF)

Lahn-Sheen Lee, Jeanette v. City of New York, et al., 05 CV 5528 (RJS) (JCF)

Lalier, Kathleen, et al. v. City of New York, et al., 05 CV 7580 (RJS) (JCF)

Macnamara, Deirdre, et al. v. City of New York, et al., 04 CV 9216 (RJS) (JCF)

Martiui, John v. City of New York, et al., 05 CV 9881 (RJS) (JCF)

Meehan, Alison, et al. v. City of New York, et al., 05 CV 5268 (RJS) (JCF)

Case 1:05-cv-09940-RJS-JCF Document 29 Filed 06/03/2008 Page 3 of 3 Moran, Matthew, et al. v. City of New York, et al., 05 CV 1571 (RJS) (JCF)

Pagoda, John v. City of New York, et al., 05 CV 7546 (RJS) (JCF)

Phillips, Jeffrey, et al. v. City of New York, et al., 05 CV 7624 (RJS) (JCF)

Pickett, Brian, et al. v. City of New York, et al., 05 CV 1567 (RJS) (JCF)

Portera, Brian v. City of New York, et al., 05 CV 9985 (RJS) (JCF)

Rechtschaffer, Jessica v. City of New York, et al., 05 CV 9930 (RJS) (JCF)

Remmes, Chris v. Chapman, Mark, et al., 05 CV 9940 (RJS) (JCF)

Ryan, Lindsay, et al. v. City of New York, et al., 05 CV 1564 (RJS) (JCF)

Sloan, Emily, et al. v. City of New York, et al., 05 CV 7668 (RJS) (JCF)

Smith, Matthew v. City of New York, et al., 06 CV 1779 (RJS) (JCF)

Stark, Jeffrey, et al. v. City of New York, et al., 05 CV 7579 (RJS) (JCF)

Tikkun, Kaitlyn v. City of New York, et al., 05 CV 9901 (RJS) (JCF)

Tremavne, Wendy, et al. v. City of New York, et al., 05 CV 1568 (RJS)(JCF)

Xu, Randy, et al. v. City of New York, et al., 05 CV 7672 (RJS) (JCF)